

JONES DAY

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September 29, 2021

Via ECF

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *In re Terrorist Attacks of September 11, 2001*, 03 MDL 1570 (S.D.N.Y.) (GBD) (SN)

Dear Judge Netburn:

Pursuant to the Court's September 27, 2021 Order (Dkt. 7146), we write on behalf of Dubai Islamic Bank (DIB) to provide a list of the expert witnesses proffered on our behalf and a brief description of the subjects of their testimony.

1. **Dennis Lormel**. Former FBI terrorism financing expert, Dennis Lormel, offers expert opinions on the origin, planning, financing, and execution of the September 11, 2001 ("9/11") terrorist attacks. He explains the funding flow of the 9/11 operation and the lack of evidence that al Qaeda used DIB bank accounts to move, store, and spend money to support the 9/11 attacks.
2. **Connie Fenchel**. Connie Fenchel, a former Financial Crimes Enforcement Network (FinCEN) official, sets forth banking standards related to the Countering the Financing of Terrorism (CFT) prior to the 9/11 attacks. She explains bank reliance on sanctions lists to help banks detect potential terrorism financing and notes that none of the DIB account holders at issue were on any U.S. sanctions list prior to the 9/11 attacks. She also explains the difficulty for banks of detecting terrorist financing and the lack of CFT guidance from international bodies such as the Financial Action Task Force prior to the 9/11 attacks.
3. **Sabah Nassar**. Former United Arab Emirates (UAE) banking professional and compliance officer, Sobhie (aka Sabah) Nassar offers expert opinions on the relevant banking and industry standards for anti-money laundering (AML) and CFT in the UAE from 1992 to the 9/11 attacks. She also opines on DIB's compliance with these standards and DIB's efforts to search and freeze accounts at the request of the UAE Central Bank immediately following the 9/11 attacks.

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4. **Martha Crenshaw**. Terrorism expert and former Stanford professor Martha Crenshaw offers expert opinions on the background of Al Qaeda before the 9/11 attacks, including its structure and operations, and the planning and execution of the 9/11 plot. Dr. Crenshaw also opines that prior to the attacks, none of the DIB account holders at issue were publicly known as being involved in the 9/11 plot, and explains Al Qaeda's reliance on secrecy to carry out the attacks.
5. **Michael McMillan**. Islamic finance expert Michael McMillen offers opinions concerning Islamic banking and the features of Dubai Islamic Bank as an Islamic Bank. Mr. McMillen also explains that DIB meets the best practices and standards governing Islamic banks, including in the areas of sharia compliance and the function of the bank's Fatwa and Sharia Supervisory Board.
6. **Aisha Musa**. Islam expert Dr. Aisha Musa offers opinions regarding Islam's characteristics and history, its comparative features to other religions, and the distortion of Islam by extremists. Dr. Musa opines on Islam's sacred texts and principles, and how terrorists misrepresent Islam.
7. **Theodore Kattouf**. Former U.S. Ambassador to the UAE Theodore Kattouf offers expert opinions on governance and diplomatic relations of the Federal Government of the UAE in the 1990s prior to the 9/11 attacks. Ambassador Kattouf explains the nature of the UAE's alliance with the U.S., its standing in the international community, and the UAE's efforts to respond to the 9/11 attacks, including through its efforts to detect and combat terrorist financing.

Respectfully submitted,

/s/ Steven T. Cottreau

Steven T. Cottreau (admitted *pro hac vice*)

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